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11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 GEORGE JARAMILLO, II, an Individual

Case No.: 2:21-cv-00891-RFB-BNW

14 Plaintiff,  
15 vs.

**STIPULATION TO EXTEND  
DEADLINE TO AMEND COMPLAINT  
(FIRST REQUEST)**

16 AREA 15 LAS VEGAS LLC, a Delaware Limited  
17 Liability Company, AREA 15 GLOBAL LLC, a  
18 Delaware Limited Liability Company, ARNOLD  
19 FISHER, an Individual, KENNETH FISHER, an  
Individual, STEVEN FISHER, an Individual,  
WINSTON FISHER, an Individual, FISHER  
BROTHERS MANAGEMENT CO. LLC, a New  
York Limited Liability Company, FISHER  
BROTHERS FINANCIAL AND  
DEVELOPMENT COMPANY LLC, a New York  
Limited Liability Company, and DOES 1-50  
Inclusive,

Defendants.

Pursuant to Fed. R. Civ. P. 16(b)(4) and Local Rules IA 6-1 and L.R. 26-3, Plaintiff and  
Defendants Area 15 Las Vegas, LLC (“Area 15 LV”), Area 15 Global, LLC (“Area 15 Global”), and  
together with Area 15 LV, the “Area 15 Entities”), Fisher Brothers Management Company, LLC

1 (“FBMC”), Fisher Brothers Financial & Development Company, LLC (“FFDC”, and together with  
 2 FBMC, the “Fisher Entities”), and Winston Fisher (“Winston”) (collectively, “Defendants”) hereby  
 3 stipulate to extend the March 11, 2022, deadline to amend pleadings and add parties, stating as  
 4 follows:

5 **I. PROCEDURAL BACKGROUND**

6       1. On May 6, 2021, Plaintiff filed his Complaint against all Defendants, as well as  
 7 now non-parties Arnold Fisher (“Arnold”), Kenneth Fisher (“Kenneth”), and Steven Fisher  
 8 (“Steven”) (collectively, the “Dismissed Parties”). [ECF 1].

9       2. On August 2, 2021, the Fisher Entities and the Dismissed Parties filed a Motion to  
 10 Dismiss for Lack of Personal Jurisdiction [ECF 21] and all Defendants and the Dismissed Parties  
 11 filed a Motion to Dismiss for Failure to State a Claim [ECF 22].

12       3. On October 25, 2021, Defendants and the Dismissed Parties filed a Motion to Stay  
 13 Discovery and Scheduling Deadlines. [ECF 38].

14       4. On December 8, 2021, Magistrate Judge Brenda Weksler granted the Motion to  
 15 Stay Discovery and Scheduling Deadlines while the two motions to dismiss remained pending. [ECF  
 16 45].

17       5. On January 25, 2022, the Court held oral argument on the two motions to dismiss.

18       6. The Motion to Dismiss for Lack of Personal Jurisdiction [ECF 21] was Granted in  
 19 Part and Denied in Part. The motion was granted with respect to the Dismissed Parties. The motion  
 20 was denied without prejudice as to the Fisher Entities.

21       7. The Motion to Dismiss for Failure to State a Claim [ECF 22] was Granted in Part  
 22 and Denied in Part. The motion was granted with respect to Plaintiff’s claims for wrongful  
 23 termination, defamation, breach of contract, fraud, and violations of Section 1981, with leave to  
 24 amend. Plaintiff was given until March 11, 2022, to file an Amended Complaint with respect to  
 25 those claims. The motion was denied as to all other claims.

26       8. The stay of discovery was also lifted at the January 25, 2022, hearing. Plaintiff was  
 27 permitted to take jurisdictional discovery until April 25, 2022. Defendants are permitted to file a

1 partial motion for summary judgment with respect to the Fisher Entities by April 25, 2022.  
2

3 **II. THE PARTIES HAVE COMPLETED THE FOLLOWING DISCOVERY**

4 1. On October 13, 2021, Plaintiff served his Initial Disclosures.

5 2. On February 4, 2022, Plaintiff served FRCP 34 document demands to the Area 15  
6 Entities, the Fisher Entities, and also the Dismissed Parties.

7 3. On February 4, 2022, Plaintiff served FRCP 33 interrogatories on the Dismissed  
8 Parties.

9 4. On February 8, 2022, Plaintiff served a FRCP 34 document demand to Winston.

10 5. On February 9, 2022, Defendants circulated a draft ESI Protocol and Stipulated  
11 Protective Order for Plaintiff's review and comment.

12 6. On February 14, 2022, the parties engaged in a continued FRCP 16.1 conference.

13 7. On February 18, 2022, Defendants served their Initial Disclosures.

14 8. On February 28, 2022, the parties engaged in a meet and confer telephonic  
15 conference with respect to the FRCP 34 document demands served on the Defendants, at which the  
16 parties reached several agreements as to, among other things, the document demands and  
17 interrogatories to narrow the responses.

18 9. On March 4, 2022, Plaintiff agreed to the form of the Stipulated Protective Order.

19 10. On March 8, 2022, this Court entered the Stipulated Confidentiality Agreement and  
20 Protective Order. [ECF 57].

21 **III. DISCOVERY TO BE COMPLETED**

22 The Fisher Entities and the Area 15 Entities' responses to the February 4, 2022, FRCP 34  
23 requests were originally due by March 7, 2022, while Defendant Winston's responses to the February  
24 8, 2022, document demand are due by March 10, 2022. However, the meet and confer process  
25 described above has resulted in agreements as to those requests to narrow the number and scope of  
26 the same.

27 **IV. GOOD CAUSE EXISTS TO EXTEND DEADLINES**

28 The parties are continuing to work to establish protocols and the necessary protection for

1 Defendants to provide responses to the discovery requests and to narrow the scope and number of the  
2 requests. However, there simply will not be enough time for Defendants to produce the documents or  
3 for Plaintiff to review all of the responses in order to amend his Complaint by the March 11, 2022,  
4 deadline, in light of continued efforts between the parties to efficiently narrow the scope of necessary  
5 discovery and items needed to provide the above responses to Plaintiff. Good cause therefore exists  
6 and no prejudice will result in continuing the deadline set by the Court at the January 25, 2022,  
7 hearing to amend the Complaint by forty-five (45) days.  
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9 Accordingly, and for good cause shown, the parties respectfully request that the Court  
10 continue the deadline to amend the complaint and add parties by forty-five (45) days. On March 8,

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1 2022, the undersigned counsel conferred in accordance with Fed. R. Civ. P. 26(f).  
2  
3 DATED this 10th day of March, 2022.

4 BROWN CLARK LE AMES STEDMAN & CEVALLOS LLP  
5  
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19  
20 IT IS SO ORDERED:  
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22   
23 UNITED STATES MAGISTRATE JUDGE  
24 DATED: March 11, 2022  
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